

Attorneys for Defendant
INSIGHT CAPITAL, LLC

EMI BRUEMMER,)	Case No. 4:20-cv-06139-JST
)	
Plaintiff,)	JOINT STIPULATION TO STAY ACTION
)	PENDING COMPLETION OF
v.)	ARBITRATION
)	
INSIGHT CAPITAL, LLC)	
)	
Defendant.)	

WHEREAS, Plaintiff filed her original complaint [Doc 1] alleging claims pursuant to the Telephone Consumer Protection Act, 47 U.S.C. §227, *et seq*; Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq*; and Rosenthal Fair Debt Collection Practices Act, Cal. Civ. Code §1788, *et seq*. on August 31, 2020;

WHEREAS, Plaintiff's claims involve actions taken in connection with a January 16, 2020 Line of Credit Agreement ("Agreement") between Plaintiff and Green Bear of California, LLC dba Crestline Finance ("Crestline"). A redacted copy of the Agreement is attached as Exhibit A and incorporated by reference;

WHEREAS, Plaintiff served the summons and complaint on Insight Capital on September 18, 2020, making Insight Capital's response due on October 9, 2020;

1 WHEREAS, Insight Capital expressed its intent to respond to the complaint with a motion to
2 stay or dismiss the case based on the arbitration provision in the Agreement; and

3 WHEREAS, the Parties have agreed to submit the matter to arbitration and agree that good cause
4 exists to stay the action pending completion of the arbitration process;

5 NOW THEREFORE, Plaintiff and Insight Capital stipulate, agree, and jointly request that the
6 Court stay this action pending completion of the binding arbitration contemplated by the Agreement.

7 **IT IS SO STIPULATED.**

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9 DATED: October 9, 2020

WAJDA LAW GROUP, APC

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12 By: /s/ Nicholas Wajda
Nicholas M. Wajda
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Attorneys for Plaintiff

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15 DATED: October 9, 2020

TUCKER ELLIS LLP

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18 By: /s/ Samlecia D. Gaye
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INSIGHT CAPITAL, LLC

CERTIFICATE OF SERVICE

This Certificate of Service is made in compliance with Local Rule 5.1.2 and Civ.R. 5(b). I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is 201 Mission Street, Suite 2310, San Francisco, CA 94105.

On the date indicated below, a true and correct copy of the foregoing **JOINT STIPULATION TO STAY ACTION PENDING COMPLETION OF ARBITRATION; [PROPOSED] ORDER** was filed with Court and served electronically and will be available for viewing and downloading from the Court's CM/ECF system:

The Notice of Electronic Case Filing automatically generated by the system and sent to all parties entitled to service under the Federal Rules of Civil Procedure and the Local Rules of the Northern District of California who have consented to electronic service shall constitute service of the filed document to all such parties.

I declare under penalty of perjury that I am employed in the office of a member admitted to practice before the District Court for the Northern District of California and ECF registered in this Court at whose direction the service was made and that the foregoing is true and correct.

Executed on, October 9, 2020, at San Francisco, California.

By /s/ Anna Villanueva
Anna Villanueva